



September 15, 2010

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: PS Docket 07-114

Dear Ms. Dortch:

This is in response to an *ex parte* letter submitted on September 14, 2010, by Verizon Wireless. In 2008, APCO, NENA and Verizon Wireless engaged in extensive negotiations that led to an agreement regarding improved location accuracy for E911 calls based on county-level measurements. Per the agreement, “a carrier may exclude up to 15% of counties ... based upon heavy forestation that limits handset-based technology accuracy in those counties.” *See* Letter from APCO, NENA and Verizon, dated August 20, 2008. Verizon Wireless now seeks to be able to exclude 15% of counties for “any reason.” APCO and NENA oppose that modification. Limiting the exclusion to heavily forested areas was a material element of the negotiated agreement. Our concern had been, and remains, that a broader exclusion could lead to substantial areas receiving substandard location accuracy for E911 calls.

Please contact the undersigned should the Commission have any questions.

Respectfully submitted,

Robert M. Gurss  
Regulatory Counsel  
APCO International

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CEO  
National Emergency Number Association

cc: Rick Kaplan  
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